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February 10, 2015

Keith Olinger, SFD-7-5
U.S. Environmental Protection Agency, Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105

Re: CERCLA Section 104(e) Request for Information Related to Real Property at
11934 Washington Blvd. (formerly known as 11940 Washington Blvd.), Whittier, CA;
Omega Chemical Corporation Superfund Site

Dear Mr. Olinger:

My client Circor Instrumentation Technologies, Inc. is in receipt of your letter dated December 9, 2014 and we appreciate the extension of time granted to us on December 22, 2014 to research the matter and provide responses to your inquiry. Answers provided to the questions posed are those for which there is available information. There are many detailed questions requesting specific information of which my client has no knowledge.

1. Outside legal counsel Anette Seltzer Lewis, Esq. (contact information is on the letterhead) compiled responses to EPA's questions based on information provided by Circor Instrumentation Technologies, Inc. after a diligent search looking for any information that could relate to the Washington Blvd., Whittier, CA property that is the subject of your inquiry; and Alan J. Glass, Vice President & Secretary of Circor Instrumentation Technologies, Inc., 30 Corporate Drive, Suite 200, Burlington, MA 01803, who has been with the company since February 2000.
2. Circor Instrumentation Technologies, Inc., a Delaware Corporation, is an active corporate entity. As relates to the request for information concerning the Washington Blvd., Whittier, CA property: in April 1999, Circle Seal Controls, Inc., a Delaware corporation, purchased the stock of GO Regulator, Inc., a California corporation (formerly known as Vemco Corporation). Thereafter, in approximately 2002, GO Regulator, Inc. was merged into Circor Instrumentation Technologies, Inc. (also a subsidiary of Circle Seal Controls, Inc. and, at that time, Circor Instrumentation Technologies, Inc. was known as Hoke, Inc.). In approximately the 2006-2008 timeframe, Circle Seal Controls,

- Inc. changed its name to Circor Aerospace, Inc. Currently, Circor Aerospace, Inc. owns all of the shares of Circor Instrumentation Technologies, Inc.
- a. See response to 2. above.
 - b. Upon information and belief, at least until April 1999, "GO Inc.", a fictitious name of GO Regulator, Inc., was used as a trade name and trademark pursuant to California law.
 - c. See response to 2. above.
3. See response to 2. and a., b., & c. above
4. On information and belief, Vemco occupied the Washington Blvd., Whittier, CA property from 1987-1992 and, by the time of the April 1999 stock purchase, the property was no longer under the ownership, possession or control of GO Regulator, Inc. Circor Instrumentation Technologies, Inc. (hereinafter Circor) has no further knowledge with regard to property ownership, lease/rental arrangements, nor does it have any other relationship to the real property owner.
5. See response to 4. above.
6. See response to 4. above.
7. With regard to the period prior to Circor's purchase of GO Regulator, Inc. stock, see response to 4. above. With regard to the period subsequent to the stock purchase, Circor has no knowledge of the property or any individual or entity that owned or operated it.
- a. See responses to 4. and 7. above.
 - b. On information and belief, Vemco maintained a small operation for "supplemental machining" (rush and custom jobs and overflow). See also response to 7. above.
 - c. Circor has no such documents.
 - d. Circor has no such documents.
8. Circor has no information with regard to the named entities.
9. See response to 4. above. Circor has no information concerning the condition of the property when Vemco first took possession of it.
10. See response to 7.b. above. Circor has no further information.
- a. Circor has no such information.
 - b. Circor has no such information.
 - c. Circor has no such information.
 - d. Circor has no such information.
 - e. Circor has no such information.
 - f. Circor has no such information.
11. a. Circor has no such information.

- b. Circor has no such information.
 - c. Circor has no such information.
 - d. Circor has no such information.
 - e. Circor has no such information.
 - f. Circor has no such information.
12. On information and belief, Vemco may have used the following types of hazardous substances at the Washington Blvd., Whittier, CA property: oil, acid, and solvent-based and water-based degreasers.
- a. Circor has no such information.
 - b. On information and belief, Vemco had a small table-top vapor degreaser for occasional use in cleaning small parts. Circor has no other information.
 - c. On information and belief, any hazardous waste from the Washington Blvd., Whittier, CA property was transported offsite for treatment, storage or disposal in the course of business. Circor has no other information.
 - d. Circor has no such information.
 - e. Circor has no such information.
 - f. Circor has no such information.
 - g. Circor has no such information.
13. On information and belief, in the mid-1980s, an employee poured approximately 5 gallons of spent Bright Dip (an acid mixture) onto the side of an adjacent road. The Fire Department was alerted, performed an inspection, and no remediation was required. Circor has no further information.
- a. See response to 13. above.
 - b. See response to 13. above.
 - c. See response to 13. above.
 - d. See response to 13. above.
 - e. See response to 13. above.
 - f. See response to 13. above.
14. Circor has no such information.
15. At the time of the stock purchase in April 1999, GO Regulator, Inc. and its shareholders provided representations and warranties to Circle Seal Controls, Inc. that, with the exception of the one release mentioned in 13. above, no hazardous material had ever been spilled, released, or disposed of at the Washington Blvd., Whittier, CA property nor had such substance ever come to be located in the soil or groundwater at the property. Circor has no other information.
16. Circor has no such information.
17. Circor has no such information.

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Kindly address any future correspondence on this matter to my attention.

Very truly yours,


Anette Seltzer Lewis

cc: Alan J. Glass